

Ethical Trading Policy

INTRODUCTION

OUR MISSION

We want to change the way people eat forever. On our mission we are guided by our three basic ethical values: respect, responsibility and integrity. These values shape our culture and the way we do business. We believe that upholding these values everyday within our own operations and through our supply chains is the foundation for building strong and sustainable relationships with our own people, our customers, our shareholders and our partners. Together, we are committed to foster a diverse and inclusive culture based on common ethical standards, respect of human rights and labor rights, compliance with applicable laws and the shared understanding that it is up to all of us to help to preserve our planet.

The HelloFresh Ethical Trading Policy (“Policy”) sets out the principles that we believe are essential to translate our values into action (“Ethical Trading Standards”). Our Ethical Trading Standards are based on the standards of the Universal Declaration of Human Rights and the International Labour Organization’s (ILO) Declaration on the Fundamental Principles and Rights at Work.

WHO THIS POLICY APPLIES TO

At HelloFresh, we hold ourselves accountable to the Ethical Trading Standards set out in this Policy and expect our business partners to adhere to the same standards. This Policy applies to all suppliers, agents, consultants and other service providers (“Partners”) of HelloFresh SE and all its subsidiaries (“HelloFresh”). It covers everyone working for or on behalf of HelloFresh or our Partners, including but not limited to full and part-time employees as well as temporary workers.

WHAT WE EXPECT FROM OUR PARTNERS

We expect our Partners to work with us to build strong and sustainable partnerships by upholding the Ethical Trading Standards set out in this Policy in their own operations and along their supply chains. This means (i) compliance with the Ethical Trading Standards in their own operations, (ii) ensuring that their supply chain partners also meet these Ethical Trading Standards, (iii) immediate reporting of any concerns regarding violations of the Ethical Trading Standards at HelloFresh, in their own operations or supply chain and (iv) cooperation in the remediation of violations of the Ethical Trading Standards.

OUR ETHICAL TRADING STANDARDS

RESPECT HUMAN AND LABOR RIGHTS

At HelloFresh, we are committed to treating all people with dignity and respect. We are aware of our responsibility and the importance of promoting human rights and labor rights throughout our own operations and our supply chain and expect our Partners to take an active part in tackling prohibited practices and ensure worker's welfare.

Forced or bonded labour

We will not accept any form of forced or bonded labour, slavery or servitude:

- Work must be voluntary and must not be conducted as a result of any verbal or physical coercion, intimidation or deception, including involuntary prison labour.
- Every worker has the freedom of movement and can end their employment without penalty at any time with or without cause and advance notice except where otherwise provided for in a written employment contract in accordance with applicable laws.
- Migrant workers may only be employed based on a valid working permit.
- Employers must not unlawfully withhold workers' identity or immigration documents (e.g. passports, visas, ID cards, citizenship papers) at any time. The documents shall only be held by the employer to enable fulfillment of relevant legal obligations and only with the permission of the worker. All documentation must be immediately returned to the worker once the relevant legal obligations are complete. In cases where the employer holds the workers' identity documents for safekeeping, the workers must have access to the documents at all times, and there must be no constraints on the ability of the worker to leave the enterprise.
- Workers shall not be charged directly or indirectly any fees or related costs for their recruitment or employment unless permitted by applicable law.

Child labour and protection of young workers

We have zero tolerance for any form of unlawful child labour:

- No children under the minimum age provided for in the ILO Convention No. 138, i.e. 15 years (13 years for light work), or provided for under applicable local laws whichever is higher, must be employed. In such instances where light work (work of persons 13 to 15 years of age) is used, it must not harm a child's health and development and must not prejudice attendance at school and participation in vocational training.
- Employment of young workers (i.e. all workers below the age of 18 and at or above the applicable minimum age, but no less than 15 years) is only allowed subject to provision of additional protection, including the prohibition of the deployment of young workers for hazardous work and, where the ILO Convention No. 138 is ratified, the prohibition of work for night shifts or during compulsory education hours.

- Proof of age must be provided, reviewed and documented.

Non-discrimination and equal treatment

We understand the respectful and equal treatment of all people to be the foundation of a healthy and sustainable work environment:

- All people shall be treated with dignity and respect.
- No one shall be favored or disadvantaged on the grounds of personal characteristics such as race, national origin, colour, caste, social origin or position, gender, gender expression, sexual orientation, religion, age, disability, political opinion, marital status or any other characteristics protected by applicable law.
- All decisions regarding hiring, remuneration, training, promotion, termination, retirement and/or other employment practices must be made on the basis of non-discriminatory reasons, such as the person's ability to do the job and their performance or changes in business conditions.
- No worker may be subject to harassment including any forms of bullying, intimidation, direct insults, malicious gossip or victimization. Any use or threat of physical, sexual or verbal abuse is strictly prohibited.

Employment contracts, wages and working hours

We expect any employment to be conducted professionally and in accordance with the law:

- Workers shall be provided with a clear and understandable written document including the basic information regarding their employment (i.e. agreed salary/frequency of pay) prior to the commencement of employment to the extent required under applicable law.
- Wages must be paid regularly, on time and in full by way of legal tender or negotiable instruments directly to the worker. Deductions to wages must not be used as a disciplinary measure and are only allowed with the prior written permission by the worker except where permitted under applicable local laws.
- Wages must be appropriate and must at least correspond to the local statutory minimum wage and meet the minimum legal requirements where the work is conducted.
- Employers must ensure all workers are legally authorized for work in the relevant country.
- The number of hours worked (excl. overtime) must not exceed the maximum working hours allowed according to applicable laws.
- Overtime work must be used responsibly. The extent, frequency and hours worked by individual workers and the workforce as a whole must be considered when assessing if overtime is appropriate. Overtime hours must not exceed the numbers allowed by applicable laws.
- Employees must be given appropriate meal and rest breaks to prevent excessive physical and mental fatigue due to long working hours in accordance with applicable laws.

Freedom of association and the right to collective bargaining

We respect workers' legal rights to freedom of association and collective bargaining:

- Workers are free to form representative bodies and join a trade union of their own personal choice where legal under applicable local laws.
- Workers shall neither be discriminated against nor shown preference for using the right to belong or not belong to a trade union or representative body.

Provision of a safe and hygienic workplace

We understand the provision of a safe and healthy workplace as a basic requirement for everyone to be able to do their job:

- Employers must comply with all applicable workplace safety requirements and take appropriate measures to prevent injury and accidents arising in the workplace by identifying and minimising causes of hazards.
- Workers must be provided with regular health and safety training, as required by applicable law.
- Workers must be provided with access to basic facilities to support worker health and safety, such as sanitary toilets and potable water as well as protective equipment (e.g. fire extinguishers, first aid equipment, etc).
- A senior manager shall be accountable for health & safety.
- Any accommodation or transportation provided by the employer must meet requirements for safety, hygiene and habitability under applicable laws.
- If health and safety risks are increased due to unusual circumstances (e.g. pandemics, natural disasters etc.), employers must comply with appropriate health standards, recommendations and regulations to ensure safe labor conditions for workers.

Resources of local communities

We respect the resources rights of local communities:

- Any rights of local communities under applicable local, national or international laws regarding water, traditional land or other resources must be respected, i.e. any changes to land use or other measures affecting the resources of local communities are only permitted in case of strict compliance with applicable laws.
- Unlawful forced evictions are not permitted.

TAKE RESPONSIBILITY FOR OUR PLANET

The fight against climate change, the development of solutions for the responsible use of our natural resources and the preservation of biodiversity are one of the greatest challenges of our time. We only have one planet and it is up to each and every one of us to help to preserve it. At HelloFresh, we are committed to constantly improving

all of our operations in a way that not only minimizes our ecological footprint but enables us to contribute to a more sustainable food system. We understand our Partners are vital in pursuing this undertaking and expect them to make continuous efforts to also minimize their own ecological footprint.

Environmental protection and permits

We expect our Partners to comply with all applicable laws and regulations related to environmental protection. We also expect our Partners to obtain all required environmental permits and to ensure that these are up to date and complied with.

Hazardous materials

Hazardous materials, chemicals and substances must be labeled as such and their safe handling, movement, storage, recycling, reuse and disposal must be ensured. We expect compliance with all applicable laws and regulations regarding hazardous materials, chemicals, including any substance restrictions and product safety requirements.

Climate protection and responsible use of resources

We also expect our Partners to reduce their environmental impact by introducing sustainable practices to protect the environment and conserve natural resources for their own business and along their supply chain. This includes, in particular, measures to avoid or continuously reduce energy consumption, emission of greenhouse gas, packaging, waste, water consumption as well as harmful impacts on air, soil and water and to preserve biodiversity. Our Partners agree to collaborate with HelloFresh to continuously improve the transparency, tracking and reporting of the aforementioned environmental topics.

PRESERVE INTEGRITY

We understand strict compliance with all applicable laws as foundational for building trust with our customers, our partners and our people and we require the same from our Partners.

Fair competition

We believe that fair competition is the basic precondition for a healthy market. We expect from our Partners to comply with all applicable anti-trust and competition laws and regulations. This includes in particular to refrain from engaging in any anti-competitive discussions or entering into any anti-competitive agreements, including agreements regarding price-fixing, customer allocation or other illegal restrictive practices.

Anti-corruption and conflicts of interest

We do not tolerate any form of bribery or corruption and avoid conflicts of interest. We expect our Partners to comply with all applicable anti-corruption laws. Our Partners shall not offer or accept any form of unlawful benefits with the purpose of obtaining or securing a business opportunity or favorable treatment. Unlawful benefits may include but are not limited to cash, kick-back or facilitation payments as well as job opportunities or inappropriate gifts and invitations.

Anti-money laundering and trade sanctions

We strictly comply with any applicable laws and regulations on anti-money laundering as well as with applicable economic and trade sanctions and expect the same from our Partners.

Data privacy

As with any e-commerce company, our business depends on our customers and partners being comfortable to provide us with their personal information that we need to perform our services. We take data privacy very seriously and expect the same from our Partners. This includes as a basic requirement strict compliance with all applicable data protection laws and any obligations resulting from contracts with HelloFresh when collecting, storing, processing or otherwise using personal information. We expect our Partners to promptly notify us of any actual or suspected data breach in their own systems.

Intellectual property and confidential information

We put lots of thought, heart and financial means in the development of our different brands, trademarks and products as do our partners. We respect our Partners confidential information and intellectual property rights, trademarks and copyrights and expect the same from our Partners by implementing appropriate safeguards against misuse, mishandling or improper disclosure in accordance with applicable laws and the contractual agreements with HelloFresh.

REPORTING OF CONCERNS AND MONITORING

REPORTING OF CONCERNS REGARDING VIOLATIONS

We can only follow-up on concerns regarding violations of this Policy and take appropriate action if we are aware of them. We therefore expect anyone who feels that the Ethical Trading Standards set out in this Policy may have been violated, either in our own operations at HelloFresh, at our Partners or in their supply chains (regardless of whether or not HelloFresh is directly impacted), to immediately notify us of any such concern. This also includes any third party allegations or enforcement actions involving practices that may constitute a violation of the Ethical Trading Standards. Reports can be provided via the [HelloFresh | Speak up!](#) platform (<https://hellofresh.whistleblownetwork.net>), a whistleblowing tool which also allows for anonymous reporting, or via email to compliance@hellofresh.com.

RISK MANAGEMENT

We also expect our Partners to assess potential implications that their business activities may have regarding the protected rights set out in this Policy. Partners must also maintain appropriate management systems, processes and guidelines to prevent, identify, monitor compliance and remediate violations in their own operations and supply chains. This also requires that our Partners are aware of all their supply chain partners, including any production sites, sub-suppliers and other partners and take measures to implement the requirements under this Policy with their employees and supply chain partners accordingly. This includes the provision for suitable contractual regulations, regular communication and training for own employees on the requirements under this Policy, support with their implementation and monitoring of compliance. From our Partners supplying us with

ingredients for our products we expect to be able to prove the country of origin of the used agricultural raw materials.

Our Partners should also provide easily accessible, reliable and fair reporting mechanisms for their employees including the possibility to report concerns anonymously. Individuals who report concerns in good faith must not be subject to any retaliation and we expect our Partners to provide for appropriate protection.

We reserve the right to request from our Partners the provision of any information and data necessary to verify their compliance with this Policy and to comply with our reporting obligations under applicable laws. This also includes the provision of a complete representation of a Partner's supply chain. The information must be sent to HelloFresh upon request.

AUDITS

HelloFresh reserves the right to conduct on-site visits and audits or require a third party audit is undertaken regarding our Partner's compliance with this Policy at any time. This also includes audits to verify whether a Partner complied with an agreed corrective action plan. For this purpose, employees of HelloFresh or third parties shall be entitled to inspect the Partner's premises and operating facilities during business hours. Audits can include any areas relevant to verify compliance with this Policy across production facilities, farms, worker accommodation, offices, distribution centres and storage sites. We expect our Partners to fully cooperate, provide us with all relevant information and access to the premises. Where third party audit standards are used, the Partner and HelloFresh must agree on the standard, scope and methodology selected. Partners must provide HelloFresh access to the full audit reports once available. Partners must complete corrective actions to the agreed timescale for all non-conformance identified in both third party audits and those conducted by HelloFresh.

CONSEQUENCES IN CASE OF VIOLATIONS

We will not tolerate any violations of the Ethical Trading Standards set out in this Policy. If we become aware of any violations, including where a potential Partner cannot initially achieve full compliance with this Policy, it is our primary goal to swiftly remediate identified violations together with our Partners. For this purpose, we reserve the right to define and agree with our Partners on corrective action plans to mitigate violations within an agreed timeline as well as to suspend or terminate contracts with a Partner in case of severe violations or where a Partner is not able or willing to agree on or comply with a corrective action plan.

We hereby confirm that we accept the HelloFresh Group Ethical Trading Policy:

Date, Location

On behalf of (Company)

Signature
Name: